GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue New York, NY 10166-0193 Tel 212.351.4000 www.gibsondunn.com

Christopher M. Joralemon Direct: +1 212.351.2668 Fax: +1 212.351.5268 CJoralemon@gibsondunn.com

June 6, 2022

VIA EMAIL AND HAND DELIVERY

Michael J. Hampson Matthew A. Peller Lawrence M. Rolnick Rolnick Kramer Sadighi LLP 1251 Avenue of the Americas New York, NY 10020

Re: Orbis Glob. Equity LE Fund v. Vale S.A., No. 21-cv-6590 (E.D.N.Y.)

Dear Counsel:

I write on behalf of Defendants Vale S.A., Murilo Ferreira, Fabio Schvartsman, Luciano Siani Pires, Gerd Peter Poppinga, and Luiz Eduardo Froes do Amaral Osorio in connection with the above-captioned matter. Pursuant to the Court's Individual Motion Practices, enclosed please find copies of the following motion papers that Defendants intend to file with the Court on August 11, 2022 once the parties have completed their briefing of Defendants' Motion to Partially Dismiss the Complaint:

- 1. Notice of Defendants' Motion to Partially Dismiss the Complaint;
- 2. Defendants' Joint Memorandum of Law in Support of Their Motion to Partially Dismiss the Complaint; and
- 3. Declaration of Christopher M. Joralemon, with accompanying exhibits.

Sincerely,

/s/ Christopher M. Joralemon

Enclosures

cc: Ellen Mulqueen (via ECF and First Class Mail)